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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

SEOUL SEMICONDUCTOR CO., LTD. and  
SEOUL VIOSYS, CO., LTD.

Plaintiffs,

vs.

PHILCOR T.V. & ELECTRONIC LEASING,  
INC. d/b/a ENERGYAVENUE.COM,

Defendants.

Case No.: 2:18-cv-00383-RFB-NJK

**STIPULATION AND [PROPOSED  
ORDER] FOR ENTRY OF CONSENT  
JUDGMENT**

Plaintiffs Seoul Semiconductor Co., Ltd. and Viosys Co., Ltd. (collectively “Seoul”) and  
Defendant Philcor T.V. & Electronic Leasing, Inc. dba Energyavenue.com (“Philcor”) stipulate  
to entry of Consent Judgment against Philcor and in favor of Seoul on Seoul’s claim of patent

1 infringement, and any potential defenses or counterclaims, including any defense of non-  
2 infringement or invalidity. The stipulation is based upon the following:

- 3 1. Seoul alleges, and Philcor does not dispute, that Philcor has sold lighting devices  
4 and/or LED light bulbs that were manufactured by third parties and infringe U.S.  
5 Patent No. 9,627,435, U.S. Patent No. 9,093,627, U.S. Patent No. 9,577,157, U.S.  
6 Patent No. 7,700,960, U.S. Patent No. 8,168,988, U.S. Patent No. 8,860,331; U.S.  
7 Patent No. 8,829,552; U.S. Patent No. 8,716,946; U.S. Patent No. 9,716,210; U.S.  
8 Patent No. 7,951,626; U.S. Patent No. 9,450,155; and U.S. Patent No. 8,664,638  
9 (collectively, “the Patents in Suit”) that are owned by Seoul.  
10  
11 2. Philcor does not contest that the Patents in Suit are valid.  
12  
13 3. The Parties therefore agree that a Consent Judgment should be entered in favor of  
14 Seoul and against Philcor on Seoul’s claim of patent infringement of the Patents in  
15 Suit.

16 Accordingly, the Parties stipulate and request that the Court enter the following Consent  
17 Judgment, attached hereto as Exhibit A.

18 DATED this 13th day of August, 2018.

19 **SANTORO WHITMIRE**

20  
21 /s/ Jason D. Smith  
22 Nicholas J. Santoro (Nev. Bar No. 532)  
23 Jason D. Smith (Nev. Bar 9691).  
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26 Michael Eisenberg (*pro hac vice* admitted)  
27 **HOLLAND & KNIGHT LLP**  
28 31 West 52nd Street

DATED this 13th day of August, 2018

**HOLLEY DRIGGS WALCH FINE  
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10 *Attorneys for Plaintiffs*

11 **IT IS SO ORDERED.**

12 

13 RICHARD F. BOULWARE, II  
14 UNITED STATES DISTRICT JUDGE

15 DATED this 31st day of August, 2018.

# **Exhibit A**

Consent Judgment

NICHOLAS J. SANTORO (Nev. Bar No. 532)  
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SEOUL VIOSYS, CO., LTD.

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PHILCOR T.V. & ELECTRONIC LEASING,  
INC. d/b/a ENERGYAVENUE.COM,

Defendants.

Case No.: 2:18-cv-00383-RFB-NJK

**CONSENT JUDGMENT**

**CONSENT JUDGMENT**

Based upon the Stipulation and Proposed Order for Entry of Consent Judgment submitted  
by Plaintiffs Seoul Semiconductor Co., Ltd. and Seoul Viosys Co., Ltd. (collectively, "Seoul")

1 and Philcor T.V. & Electronic Leasing, Inc. dba Energyavenue.com (“Philcor”), consent  
2 judgment against Philcor and in favor of Seoul is hereby entered, as follows:

- 3 1. U.S. Patent No. 9,627,435, U.S. Patent No. 9,093,627, U.S. Patent No. 9,577,157,  
4 U.S. Patent No. 7,700,960, U.S. Patent No. 8,168,988, U.S. Patent No. 8,860,331;  
5 U.S. Patent No. 8,829,552; U.S. Patent No. 8,716,946; U.S. Patent No. 9,716,210;  
6 U.S. Patent No. 7,951,626; U.S. Patent No. 9,450,155; and U.S. Patent No. 8,664,638  
7 (collectively, “the Patents in Suit”) asserted by Seoul against Philcor in this matter are  
8 not invalid.  
9
- 10 2. Philcor has sold lighting devices and/or LED light bulbs that were manufactured by  
11 third parties and have been accused by Seoul in the above-captioned cases. Seoul  
12 contends, and Philcor does not dispute, that such lighting devices and/or LED light  
13 bulbs infringe the Patents in Suit.  
14
- 15 3. Seoul and Philcor shall bear their own costs, expenses and attorneys’ fees.  
16
- 17 4. This Court retains exclusive jurisdiction of this matter to enforce this Consent  
18 Judgment.

19 **IT IS SO ORDERED.**

20 \_\_\_\_\_  
21 UNITED STATES DISTRICT JUDGE

22 Dated: \_\_\_\_\_  
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